

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	Case No. 14-35043
	§	
SAMUEL E. WYLY,	§	Chapter 11
	§	
DEBTOR	§	
	§	

NOTICE OF FILING OF DEBTOR'S REVISED BUDGET (60 DAYS)

PLEASE TAKE NOTICE that, pursuant to the Court's *Interim Order Authorizing Limited Use of Cash Collateral and Granting Adequate Protection* [Docket No. 57] and in connection with the Debtor's *Motion for Order on Estate Administration* [Docket No. 5], the Debtor hereby submits his revised budget (the "Revised Budget"), attached hereto as Exhibit A.

On Friday, October 31, 2014, the Debtor delivered a draft of the Revised Budget to respective counsel for the Securities and Exchange Commission ("SEC"), Internal Revenue Service ("IRS"), United States Trustee ("UST"), and BBVA Compass Bank ("Compass Bank"). On Monday, November 3, 2014, a group conference call was held among Compass Bank, the IRS, the Debtor's proposed Chapter 11 counsel, Vinson & Elkins LLP ("V&E"), and the Debtor's proposed accountants and financial advisors, Lain, Faulkner & Co., P.C. ("LainFaulkner") to discuss the Revised Budget. Approximately 15 minutes before the previously scheduled conference call, the U.S. District Court, Southern District of New York, Hon. Shira A. Scheindlin, District Judge presiding in *SEC v. Wyly et al*, Civ.

No. 10-cv-5760 (SAS) scheduled a telephonic hearing regarding the SEC's requested asset freeze order so a separate call was had immediately after that hearing with the SEC, V&E, and LainFaulkner. The Debtor has made some modifications to the Revised Budget which were disclosed on the calls. The parties still have not reached an agreement with respect to the Revised Budget, although no specific objections have been articulated as of this time.

The Debtor will continue to work in advance of the November 7, 2014 hearing (the "Hearing") to address any questions by the SEC, IRS, and/or Compass Bank. The Debtor reserves the right to further supplement or modify the Revised Budget at any time prior to the Hearing.

Dated November 3, 2014

Respectfully submitted,

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PROPOSED COUNSEL FOR THE DEBTOR

CERTIFICATE OF SERVICE

I certify that on November 3, 2014, a copy of the foregoing document was served by (i) the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas, which gives notice to all counsel of record and (ii) U.S. first-class mail, postage pre-paid to those parties listed on the attached Limited Master Service List.

/s/ Josiah M. Daniel, III
One of Counsel